

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VOITH PAPER GMBH & CO. KG,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 07-226-JJF
)	
JOHNSONFOILS, INC.,)	
)	
Defendant.)	

**PLAINTIFF VOITH PAPER GMBH
& CO. KG'S MOTION FOR A PROTECTIVE
ORDER PURSUANT TO FEDERAL RULES OF CIVIL
PROCEDURE 26(c) PROHIBITING THE DISCLOSURE
OF VOITH'S HIGHLY CONFIDENTIAL INFORMATION TO
INDIVIDUALS ENGAGED IN COMPETITIVE BUSINESS PRACTICES
FOR OR ON BEHALF OF VOITH'S COMPETITOR JOHNSONFOILS, INC.**

Plaintiff Voith Paper GmbH & Co. KG ("Voith") respectfully moves the Court, pursuant to Fed. R. Civ. P. 26(c), to enter a protective order providing that JohnsonFoils, Inc. ("JohnsonFoils") may not disclose Voith's highly confidential information to any individual involved, either presently or for some reasonable time in the future, in competitive business practices and decision making relating to twin wire formers—the subject matter of United States Patent Nos. 5,718,805 ("the '805 patent") and 5,972,168 ("the '168 patent") (collectively, "the Patents-in-Suit")—including competitive patent prosecution, competitive product research, competitive product development, competitive product planning, competitive marketing, and competitive bidding. As part of the requested protective order, Voith requests the imposition of a bar on patent prosecution activities relating to the Patents-in-Suit for a period of three years on any individual to whom Voith's Highly Confidential information is disclosed. The grounds for

this motion are set forth in Voith's Opening Brief in Support of its Motion filed herewith.

YOUNG CONAWAY STARGATT & TAYLOR, LLP



Adam W. Poff (No. 3990)
Chad S.C. Stover (No. 4919)
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, Delaware 19899
cstover@ycst.com
(302) 571-6600

- and

Neil F. Greenblum
Michael J. Fink
Neal Goldberg
GREENBLUM & BERNSTEIN, P.L.C.
1950 Roland Clarke Place
Reston, Virginia 20191
(703) 716-1191

Attorneys for Plaintiff Voith Paper GmbH & Co. KG

Dated: December 18, 2007

CERTIFICATE OF SERVICE

I, Adam W. Poff, hereby certify that on December 18, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:


George H. Seitz, III, Esquire
Patricia P. McGonigle, Esquire
SEITZ, VAN OGTRUP & GREEN, P.A.
222 Delaware Avenue
Suite 1500
P.O. Box 68
Wilmington, DE 19899

I further certify that on December 18, 2007, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

BY E-MAIL

Anthony S. Volpe, Esquire
Ryan W. O'Donnell, Esquire
Volpe and Koenig
United Plaza, Suite 1600
30 South 17th Street,
Philadelphia, PA 19103

YOUNG CONAWAY STARGATT & TAYLOR, LLP



Adam W. Poff (No. 3990)
Chad S.C. Stover (No. 4919)
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, Delaware 19801
(302) 571-6600
cstover@ycst.com

Attorneys for Voith Paper GmbH & Co. KG

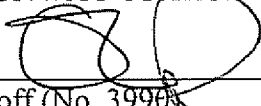
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VOITH PAPER GMBH & CO. KG,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 07-226-JJF
)	
JOHNSONFOILS, INC.,)	
)	
Defendant.)	

RULE 7.1.1 STATEMENT

Pursuant to 7.1.1 of the Local Rules of the United States District Court for the District of Delaware, I hereby certify that counsel for Voith Paper GmbH & Co. KG ("Voith Paper") has made a reasonable effort to reach agreement with counsel for JohnsonFoils, Inc. on the matters set forth in Voith Paper's Motion for a Protective Order, and that the parties have not been able to reach agreement.

YOUNG CONWAY STARGATT & TAYLOR, LLP



Adam W. Poff (No. 3996)
Chad S.C. Stover (No. 4919)
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, Delaware 19899
apoff@ycst.com
cstover@ycst.com
(302) 571-6642

- and

Neil F. Greenblum
Michael J. Fink
Neal Goldberg
GREENBLUM & BERNSTEIN, P.L.C.
1950 Roland Clarke Place
Reston, Virginia 20191
(703) 716-1191

Attorneys for Plaintiff Voith Paper GmbH & Co. KG

Dated: December 18, 2007

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VOITH PAPER GMBH & CO. KG,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 07-226-JJF
)	
JOHNSONFOILS, INC.,)	
)	
Defendant.)	

ORDER

WHEREAS, Plaintiff, Voith Paper GmbH & Co. KG ("Voith Paper"), has filed a Motion for a Protective Order (the "Motion"); and the Court having considered the respective papers submitted by Voith Paper and Defendant, JohnsonFoils, Inc., in support of, or in opposition to, the Motion; and the Court having considered oral argument of counsel for the respective parties, if any; and the Court having considered the pleadings in this matter and the current status of the case; and for other good cause having been shown;

NOW THEREFORE, the Court hereby directs the entry of Plaintiff's Proposed Protective Order included as Exhibit 8 to Plaintiff's Opening Brief in support of the Motion.

DATED: _____, 200__

UNITED STATES DISTRICT JUDGE

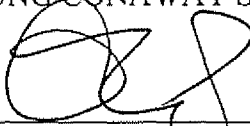
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VOITH PAPER GMBH & CO. KG,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 07-226-JJF
)	
JOHNSONFOILS, INC.,)	
)	
Defendant.)	

NOTICE OF MOTION

PLEASE TAKE NOTICE that Plaintiff, Voith Paper GmbH & Co. KG ("Voith"), will present "Plaintiff Voith Paper GmbH & Co. KG's Motion for a Protective Order Pursuant to Federal Rules of Civil Procedure 26(c) Prohibiting the Disclosure of Voith's Highly Confidential Information to Individuals Engaged in Competitive Business Practices for or on behalf of Voith's Competitor JohnsonFoil, Inc." to the Court on Friday, January 18, 2008, at a time that is convenient to the Court.

YOUNG CONAWAY STARGATT & TAYLOR, LLP



Adam W. Poff (No. 3990)
Chad S.C. Stover (No. 4919)
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, Delaware 19899
apoff@ycst.com
cstover@ycst.com
(302) 571-6600

- and

Neil F. Greenblum
Michael J. Fink
Neal Goldberg
GREENBLUM & BERNSTEIN, P.L.C.
1950 Roland Clarke Place
Reston, Virginia 20191
(703) 716-1191

Attorneys for Plaintiff Voith Paper GmbH & Co. KG

Dated: December 18, 2007